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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION AND AGREEMENT FOR
ORDER CONTINUING HEARING ON
MOTION PURSUANT TO FED. R.
BANKR. P. 9006(B)(1) TO ENLARGE THE
TIME FOR ACWA/JPIA TO FILE PROOF
OF CLAIM**

[Relates to Dkt. Nos. 5215-5217]

Regarding Motion Set for Hearing
February 26, 2020 at 10:00 a.m. PST

This stipulation (the “**Stipulation and Agreement for Order**”) is entered into by and between PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**”), as debtors and debtors in possession in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the Association of California Water Agencies Joint Powers Insurance Authority (the “**ACWA/JPIA**”), on the other hand. The Debtors and the ACWA/JPIA are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On December 27, 2019, the ACWA/JPIA filed the *Motion Pursuant to Fed. R. Bankr. P. 9006(b)(1) to Enlarge the Time for ACWA/JPIA to file Proof of Claim* [Dkt. 5215] (the “**Motion**”), and the Notice of Hearing on the Motion [Dkt. 5217], which scheduled a hearing on the Motion (the “**Hearing**”) for February 26, 2020 at 10:00 a.m. PST.

B. In the Motion, the ACWA/JPIA seeks an order expanding the time for it to file a proof of claim, attached as Exhibit 1 to the Motion, in these Chapter 11 Cases.

C. The Parties are conferring regarding a potential resolution to the Motion, and desire to adjourn the Hearing while they continue those discussions.

NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. This Stipulation shall be effective upon entry of an order by this Court approving it.

2. The February 26, 2020 Hearing shall be continued to March 10, 2020 at 10:00 a.m. PST.

3. The deadline to file any responses to the Motion is continued to March 3, 2020.

4. This Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation and Agreement for Order or the order approving it.

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Dated: February 18, 2020
WEIL, GOTSHAL & MANGES LLP

/s/ Matthew Goren
Matthew Goren

*Attorneys for Debtors
and Debtors in Possession*

Dated: February 18, 2020
STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA, P.C.

/s/ Sander L. Esserman
Sander L. Esserman

*Attorneys for the Association of California
Water Agencies Joint Powers Insurance
Authority*